

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION**

KIRK RAAB,	)	
	)	
Plaintiff,	)	
	)	
-vs-	)	No. 08 C 50087
	)	
COUNTY OF JO DAVIESS, JO DAVIESS )	)	
COUNTY SHERIFF'S OFFICE, SHERIFF )	)	
LEO HEFEL in his official capacity as )	)	
Sheriff of Jo Daviess County and his )	)	
Individual capacity, CHIEF DEPUTY )	)	
COLIN FULRATH, in his official capacity )	)	
As Chief Deputy and his individual capacity,) )	)	
DONALD SCHWEIHS, in his official )	)	
Capacity as County of Jo Daviess Public )	)	
Defender and in his individual capacity, )	)	
	)	
Defendants.	)	

**PARTIES PROPOSED CASE MANAGEMENT ORDER**

1. Pursuant to FED. R. CIV. P. 26(f), a meeting was held on August 7, 2008 via telephonic conference and was attended by:
  - Karen Munoz for Plaintiff Kirk Raab; and
  - Julie Bruch for Defendants
2. The Fed. R. Civ. 26(a)(1) material will be exchanged by August 31, 2008.
3. Parties request this case be excused from ADR.
4. Discovery Plan- The parties jointly propose to the court the following discovery plan:
  - a. Discovery will be needed on the following subjects:

Liability and Damages
  - b. Maximum of 30 interrogatories by each party to any other party.
  - c. No limit on number of request for admission to each party by any other party.
  - d. Maximum of 15 depositions by Plaintiff and 10 by Defendants.
  - e. Each deposition shall be limited to a maximum of seven hours unless extended by agreement of the parties.

- f. Fact discovery cut-off is set for April 30, 2009.
  - g. Report from retained expert for the Plaintiff under Rule 26(a) due May 15, 2009. Deposition of Plaintiff's expert shall be taken by May 31, 2009. Report from retained expert for Defendant under Rule 26(a)(2) due June 15, 2009. Deposition of Defendant's expert shall be taken by June 30, 2009. Supplementations under Rule 26(e) will be scheduled by the court at the request of the parties.
  - h. All discovery shall be cut off by June 30, 2009.
  - i. Time for the parties to amend pleadings and add counts or parties is hereby established as February 15, 2009.
  - j. The parties suggest the next discovery conference with the court be April 22, 2009.
5. All potentially dispositive motions should be filed by May 30, 2009 unless otherwise ordered by the court and the parties agree pleadings, motions and briefs may be exchanged by e-mail, fax or other electronic means.

Dated: August 8, 2008

/s Martin A. Dolan for Plaintiff

/s Julie Bruch for Defendants